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Economic Regeneration  
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Dear Sir / Madam,

### **SOUTH TYNESIDE LOCAL PLAN: PRE-PUBLICATION DRAFT (Reg 18)**

Thank you for consulting with the Home Builders Federation on the Pre-Publication Draft consultation of the South Tyneside Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

The HBF would like to submit the following comments upon selected policies within the consultation document. These responses are provided in order to assist South Tyneside in the preparation of the emerging local plan. The HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

#### **Vision and Objectives**

The HBF support the objective which looks to increase the supply and choice of the type and tenure of new homes, and which goes on to state that new homes will meet the needs of existing residents and those wishing to move to the area.

#### **Policy S1: Spatial Strategy (Strategic Policy)**

The HBF consider that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

#### **Policy S5: Re-use of Previously Developed Land (Strategic Policy)**

The first part of this policy states that the Council 'will prioritise the re-use of brownfield land within or immediately adjoining the Main Urban Area or Villages'.

Whilst the HBF consider that the re-use of previously developed land is generally a positive way to contribute to sustainability, it should not limit the development of other sustainable sites or compromise the delivery of housing to meet local needs. It is therefore recommended that the policy text be amended to refer to sustainable sites, or if reference to previously developed land is to be retained that it is supported rather than prioritised.

Part b of the second part of this policy looks to increase building densities where appropriate, taking into account the character of the surrounding area and access to services and facilities to ensure efficient use of land. It is not clear how this sits with Policy H5 which provides average densities for areas within the district.

### **Policy H1: The Number of Homes Needed by 2036 (Strategic Policy)**

This policy states that over the period 2016 to 2036 the Council will make provision for the delivery of at least 7,000 new homes, equating to 350 dwellings each year. It also provides housing requirements for East Boldon Neighbourhood Forum Area and Whitburn Neighbourhood Forum Area. It does not provide any further detail as to how the housing requirement may link to the spatial strategy set out in policy S1.

The housing requirement has been based on the CLG Standard Method for calculating the Local Housing Need (LHN). It utilises the 2014-based household projections for the period 2019 to 2029.

It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2A-010) goes on to state that these circumstances can include: growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

The HBF note that there are growth strategies for the area including the North East Local Enterprise Partnership which has prepared a Strategic Economic Plan (SEP) that looks to create 100,000 more jobs for the North East by 2024 (an uplift of 11% on 2014) and to ensure 60% of the new jobs are 'better jobs'. It is also noted that the North East Combined Authority's ambition is to work with partners to create the best possible conditions for growth in jobs, investment and contribute towards making the North East an excellent location for business, by prioritising and delivering high quality infrastructure, and to enable all residents to benefit from economic growth long into the future.

The South Tyneside Council Strategy identifies the International Advanced Manufacturing Park (IAMP) as a significant employment opportunity. The IAMP provides 150ha of employment land to the north of Sunderland's Nissan car plant and is intended to attract national and international business investment for

advanced manufacturing. The IAMP has already been designated a 'Nationally Significant Infrastructure Project' by the Government, who have pledged £42 million through the North East LEP towards infrastructure including new roads, bridges and environmental enhancements to support the development. This project will enable the construction of infrastructure, bringing a predicted £295million in private sector investment and the creation of over 7,850 new jobs by 2026/27.

The Council have been investing in infrastructure with the aim of establishing a strategic western gateway into South Tyneside and increasing the capacity for economic growth across the Borough including £3.3 million in improvements to the A19, and a £21 million South Shields Transport Interchange.

Therefore, the HBF consider that the housing need is higher than the standard method indicates, and that a higher housing requirement should be included within the Plan.

Table 1 sets out how the housing requirement could be met through the Local Plan. It identifies a residual housing requirement of 4,936 of the 7,000 still to be provided. The Local Plan seeks to allocate land for 5,425 dwellings, the Plan identifies this as an overprovision of 10%.

The HBF support the Council in providing an overprovision and in allocating more sites than required to meet the housing requirement as a buffer. However, the HBF consider that this buffer should be sufficient to deal with any under-delivery which is likely to occur. The HBF recommends an appropriate contingency would be in the order of 20% of the overall housing land supply, this would provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure. The HBF consider that such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.

### **Policy H2: Ensuring a sufficient supply of deliverable and developable housing land**

The HBF generally supports the Council in seeking to maintain a sufficiently supply of housing land over the plan period in order to ensure the delivery of the overall housing requirement and the maintenance of a rolling five year supply. However, the HBF would seek further clarity on how the Council intends to work with developers to ensure the timely development of strategic proposals.

### **Policy H3: Housing Allocations and Commitments (Strategic Policy)**

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

The HBF representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. However, the HBF do have some concerns about the delivery of homes and seek assurance that the housing requirement will be delivered.

### **Policy H5: Efficient Use of Land and Housing Density**

This policy looks for proposals to make the most efficient use of land and are developed to the optimum density. It also sets some average densities for developments in certain parts of the district and within set distances from town, district or local centres and Metro stations. The policy states that optimum densities should be determined through a design-led approach with consideration given to the site's context, connectivity and accessibility. Whilst these considerations are noted, the HBF consider that there is potential for further flexibility to be included within the policy, including consideration of the local and site characteristics, market demand and aspirations and viability.

The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

It is not entirely clear how this policy works with Policy S5 which looks to increase building densities where appropriate, taking into account the character of the surrounding area and access to services and facilities to ensure efficient use of land.

### **Policy H9: Affordable Housing**

This policy requires development of 11 or more dwellings or gross internal area of more than 1,000m<sup>2</sup>, to provide 18% affordable homes. It recognises that the requirements of this policy may make schemes unviable and identifies that the applicant can submit a detailed viability assessment. It also states that the Council will remain flexible with regards to the tenure mix, although it is expected that 10% of homes should be available for affordable home ownership.

The HBF supports the need to address the affordable housing requirements of the borough and generally supports the flexibility provided in relation to the tenure mix. However, the NPPF is clear that the levels and types of affordable housing provision set out within policies should not undermine the deliverability of the plan (para. 34). There does not appear to be a viability report available with this document and therefore at this point it is not possible for the HBF to comment on the viability of this policy or others within the document. The Council should be mindful of the impact of an overly aspirational policy requirement or combination of policies that is set too high as this will jeopardise future housing delivery.

**Policy H10: Housing Mix**

The HBF generally support the flexibility within this policy which looks for development to include an appropriate mix of dwelling types and sizes to address needs taking into account the nature of the development and character of the location.

**Policy H11: Technical Design Standards for New Homes**

This policy states that 'to ensure new homes are accessible to all, residential development should include up to 15% of new build housing in proposals of 50 homes or more designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (M4(3) standard)'. It also states that all new build housing designed to be accessible and adaptable (M4(2) standard).

The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for South Tyneside which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

**Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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